

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

JP MORGAN CHASE BANK, N.A :
SUCCESSOR BY MERGER TO CHASE :
HOME FINANCE, LLC :

Plaintiff :

v. :

C.A. No. 1-24-cv-00478

ROBERT CARVER, JR., a/k/a :
ROBERT G. CARVER, et. al. :

Defendants :

UNITED STATES OF AMERICA, et al. :
Defendants/Parties-in-Interest :

PARTY-IN-INTEREST, OCEANSIDE PROPERTIES, LLC
ANSWER TO COMPLAINT IN INTERPLEADER
(Mortgage Foreclosure Surplus Proceeds)

Now comes the Party-in-Interest, Oceanside Properties, LLC, and file its Answer as follows:

JURISDICTION

Party-in-Interest, Oceanside Properties, LLC admits paragraphs 1 and 2 as set out in the Complaint.

PARTIES

Party-in-Interest, Oceanside Properties, LLC admits paragraphs 1, 2, 3, 4, 5, and 6 as set out in the Complaint.

FACTS

Party-in-Interest, Oceanside Properties, LLC admits paragraphs 7,8,9,10, 11, and 12 as set out in the Complaint.

COUNT I- INTERPLEADER

Party-in-Interest, Oceanside Properties, LLC admits paragraphs 13, 14 and 15 as set out in the Complaint.

WHEREFORE, Party-in-Interest, Oceanside Properties, LLC respectfully request that this Court:

1. Order that Party-in-Interest, Oceanside Properties, LLC, current owner of 15 South River Drive, Narragansett, RI, be awarded \$24,594.33 from the surplus funds, the amount is made up of the following obligations of Defendants, Robert Carver and Linda Carver arising from an underlying eviction action.

- a. \$15,161.00 for movers, Jones Moving and Storage;
 - b. \$1,100.00 for Constable, Caires Constable Services; and
 - c. \$7,333.00 for use and occupancy from August 12, 2024 to September 24, 2024.
2. Grant any other and further relief as the Court deems just and proper.

PARTY-IN-INTEREST,
OCEANSIDE PROPERTIES, LLC
By Its Attorney

Dated: November 19, 2024

/s/ Thomas J. Cronin
Thomas J. Cronin, Esq. [#5302]
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CERTIFICATION

I hereby certify that on this 19th day of November, 2024:

 X I filed and served this document through the electronic filing system on the following parties: Erika L. Vogel, Esq. at evogel@harmonlaw.com; Daniel M. Caves, Esq. at daniel.m.caves@usdoj.gov; and Kevin Love Hubbard, Esq. At kevin.hubbard@usdoj.gov

The document electronically filed and served is available for viewing and/or downloading from the Rhode Island Judiciary's Electronic Filing System.

 I served this document through the electronic filing system on the following parties:

The document electronically served is available for viewing and/or downloading from the Rhode Island Judiciary's Electronic Filing System.

 I mailed or hand-delivered this document to the attorney for the opposing party and/or the opposing party if self-represented, whose name is _____ at the following address _____.

/s/ Maura E. Bettez
Maura E. Bettez